

DISTRICT OF RHODE ISLAND

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) Chapter 9

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ASSENTED-TO MOTION FOR EMERGENCY DETERMINATION OF EMERGENCY
ASSENTED-TO MOTION TO ENTER CONSENT ORDER GRANTING EXTENSION
OF TIME FOR CENTRAL FALLS POLICE DEPARTMENT, FRATERNAL ORDER OF
POLICE, CENTRAL FALLS LODGE NO. 2 TO OBJECT TO MOTION TO REJECT
COLLECTIVE BARGAINING AGREEMENT

The City of Central Falls, Rhode Island (the "City"), the debtor in the above-captioned case, by and through its state-appointed receiver, Robert G. Flanders, Jr. (the "Receiver"), hereby moves this Court pursuant to LBR 9013-2(e) to determine on an emergency basis the Emergency Assented-To Motion to Enter Consent Order Granting Extension of Time for Central Falls Police Department, Fraternal Order of Police, Central Falls Lodge No. 2 to Object to Motion to Reject Collective Bargaining Agreement.

1. On August 1, 2011, the Receiver filed a voluntary petition in the name of the City under Chapter 9 of Title 11 of the United States Code.
2. Also, on August 1, 2011, the City filed the CBA Rejection Motion seeking rejection of collective bargaining agreements with (1) the Fire Fighters' Union, (2) the Municipal Workers' Union and (3) the Central Falls Police Department, Fraternal Order of Police, Central Falls Lodge No. 2.

3. In paragraph 8 of its Initial Orders and Minutes of Status Conference, entered August 8, 2011, the Court established September 16, 2011 as the deadline to file objections to the CBA Rejection Motion.

5. Since filing its voluntary petition, the City has continued to negotiate with the Union.

6. The City and the Union have made progress in their negotiations but have not reached an agreement for a new collective bargaining agreement or a settlement of their disputes. The City and the Union believe that it would be in their mutual best interests to continue these discussions in an atmosphere under which they are not simultaneously litigating the CBA Rejection Motion. Moreover, if an agreement can be reached, there would be substantial savings of legal fees to both the City and the Union by not having commenced expensive litigation on the CBA Rejection Motion.

7. To achieve these goals, while preserving the right of the Union to object to the CBA Rejection Motion in the event continued negotiations prove unfruitful, the parties are seeking entry of the attached Consent Order extending the date by which the Union may file an objection to the CBA Rejection Motion until October 31, 2011. If this occurs, the parties would work consensually on a case management order with respect to such litigation.

8. Emergency determination is necessary because the objection date for the CBA Rejection Motion is September 16, 2011.

9. As indicated by the signatures below, Union's has assented to this motion.

WHEREFORE, for the grounds set forth, the City respectfully requests that the Court grant emergency determination of the Motion for Extension of Time to Object.

ROBERT G. FLANDERS, JR., in his capacity as
Receiver of Central Falls,
By his attorney,

/s/Theodore Orson
Theodore Orson, Esq. (No. 3874)
Christine Curley, Esq. (No. 4529)
Orson and Brusini Ltd.
325 Angell Street
Providence, RI 02906
(401) 861-0344
torson@orsonandbrusini.com

Dated: September 14, 2011

Assented to by:

**CENTRAL FALLS POLICE DEPARTMENT,
FRATERNAL ORDER OF POLICE,
CENTRAL FALLS LODGE NO. 2**

By its attorneys,

/s/ Diane Finkle
Diane Finkle, Esq.
Winograd, Shine, Land & Finkle
123 Dyer Street
Providence, RI 02903
(401) 273-8300
DFinkle@wsf-law.com

and

/s/ Carla Iafrate
Carla Iafrate, Esq.
123 Dyer Street
Providence, RI 02903
(401) 421-0065
ciafrate@verizon.net

CERTIFICATE OF SERVICE

I hereby certify that on September 14, 2011, I filed the within document with the Clerk of the Bankruptcy Court for the District of Rhode Island and thereby provided electronic notice through the CM/ECF System to the following participants:

Gary L. Donahue, Esq. ustpregion01.pr.ecf@usdoj.gov
Lee Blais, Esq. LBlais@BlaisParent.com
Elizabeth Wein, Esq. ewiens@rilaborlaw.com
Carly Beauvais Iafrate, Esq. ciafrate@verizon.net
Diane Finkle, Esq. dfinkle@wszlaw.com
William Delaney, Esq. wjd@ddlawnri.com
Steve Izzi, Esq. sizzi@mosesafonso.com
John McCoy, Esq. jmccoy@ckmlaw.com
Michael T. Benz, Esq. benz@chapman.com
Alden Harrington, Esq. harrington@bhrlaw.com
Marc Gursky, Esq. mgursky@rilaborlaw.com
Michael Benz, Esq. benz@chapman.com
Alden Harrington, Esq. harrington@bhrlaw.com
Dana M. Horton, Esq. dhorton@rc.com
Michael Kelly, Esq. mkelly@maklawfirm.com

John Mancini, Esq. jmancini@maklawfirm.com
Chris Curley, Esq. christinecurley@earthlink.net

/s/ Theodore Orson, Esq.